



**SARAH A. ZYLSTRA**  
ATTORNEY  
SZYLSTRA@BOARDMANCLARK.COM  
DIRECT (608) 283-1741  
FAX (608) 283-1709

March 11, 2022

Via E-Mail Only  
[pcovaleski@gklaw.com](mailto:pcovaleski@gklaw.com)

Paul Covaleski  
Godfrey & Kahn, S.C.  
One East Main Street, Suite 500  
P.O. Box 2719  
Madison, WI 53701-2719

Re: Edgewood v. City of Madison, et al.  
Case No. 21-CV-118

Dear Paul:

I write in response to your letter that you sent on February 8, 2022 regarding search terms. You requested the City run 10 searches for the time periods specified in each request. We have run those across the 27 custodians that the City previously identified to you. Below is the number of results for each search. I note that search #10 appeared to contain missing parentheses. We assume you meant to include a parenthesis before Memorial and after grade school and have run the search as shown in the chart below.

	Search	Time Period	Number of Documents with Hits
1.	Field OR athletic OR Goodman OR stadium OR game OR match OR practice* OR event* OR contest AND (Edgewood OR EHS).	2013-present	363
2.	Renovat* OR install* OR construct* OR "put in" OR refurbish AND field OR scoreboard OR Goodman OR complex OR turf AND (Edgewood OR EHS).	2014-2016	0
3.	"Campus institutional" OR CID OR 28.097 OR 14-0082 OR 14-82 AND (reason* OR purpos* OR rationale OR goal* OR accomplish* OR aim OR motiv* OR intend* OR intent* OR justif* OR objective* OR draft)	2012-2014	27
4.	"Master Plan" AND (Edgewood or EHS).	2013-present	10,367
5.	(Vilas OR Dudgeon OR "neighborhood association" OR neighbor OR DMNA OR VNA) AND (Edgewood OR EHS) AND ("master plan" OR field OR athletic OR Goodman OR stadium OR game* OR match* OR practice* OR event* OR contest)	2017-present	17,137
6.	(Edgewood OR EHS) AND ("master plan" OR field OR athletic OR Goodman OR stadium OR game* OR match* OR	2013-present	31,149

MARCH \_\_, 2022

PAGE 2

	practice* OR event* OR “conditional use” OR CUP OR “light* application” OR “application for light*” OR “apply for light*” OR “request for light*” OR “request light*” OR “light* request. OR contest”)		
7.	(UW OR “UW-Madison” OR “UW Madison” OR “University of Wisconsin”) AND (field* OR facility OR facilities OR stadium* OR arena* OR complex OR contest) AND (zon* or permit or “master plan”)	2017-present	18,808
8.	(Memorial OR “Madison West” OR “West High” OR LaFollette OR “La Follette” OR “Madison East” OR “East High” OR “Breese Stevens” OR UW OR “UW-Madison” OR “University of Wisconsin”) AND (field* OR facility OR facilities OR stadium* OR arena* OR complex OR contest) AND (“permitted use*” OR “conditional use*” OR game* OR match* OR practice* OR event* OR activit* OR host OR contest)	2013-present	38,766
9.	(Edgewood OR EHS) AND electric* AND (application OR apply OR permit OR grant* OR deny OR denial OR denied OR reject*)	2014-2016	132
10.	(Zone OR Zoning) AND (ticket* OR violat* OR cite OR citation OR infraction OR fine) AND (Memorial OR “Madison West” OR “West High” OR LaFollette OR “La Follette” OR “Madison East” OR “East High” OR UW OR “UW-Madison” OR “University of Wisconsin” OR “middle school” OR “primary school” OR “junior high” OR “elementary school” OR “grade school”) AND (athletic OR field* OR facility OR gym* OR complex OR game* OR match* OR event* OR contest)	2013-present	4,678
		<b>TOTAL</b>	121,427

We maintain that reviewing 121,427 records is overly broad, unduly burdensome and not proportional to the litigation. We will review and produce responsive records for searches 1-3 and 9-10. For searches 4-8, I will try to obtain more clarity on why the results are so high.

Very truly yours,

BOARDMAN & CLARK LLP

*Electronically Signed by Sarah A. Zylstra*

Sarah A. Zylstra

SAZ/ja

cc: Counsel of Record

\\msnfs2\share\DOCS\WD\25981\424\A4451799.DOCX